



4. Plaintiff/Counter-Defendant admits the allegations contained in the first two sentences of paragraph 4 of the Defendant/Counter-Plaintiffs' Counterclaim. Plaintiff/Counter-Defendant denies the allegations contained in the remainder of paragraph 4 of the Defendant/Counter-Plaintiffs' Counterclaim.

5. Plaintiff/Counter-Defendant incorporates by reference its responses to Defendant/Counter-Plaintiffs' allegations.

6. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 6 of the Defendant/Counter-Plaintiffs' Counterclaim.

7. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 7 of the Defendant/Counter-Plaintiffs' Counterclaim.

8. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 8 of the Defendant/Counter-Plaintiffs' Counterclaim.

9. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 9 of the Defendant/Counter-Plaintiffs' Counterclaim.

10. Plaintiff/Counter-Defendant incorporates by reference its responses to Defendant/Counter-Plaintiffs' allegations.

11. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 11 of the Defendant/Counter-Plaintiffs' Counterclaim.

12. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 12 of the Defendant/Counter-Plaintiffs' Counterclaim.

13. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 13 of the Defendant/Counter-Plaintiffs' Counterclaim.

14. Plaintiff/Counter-Defendant incorporates by reference its responses to

Defendant/Counter-Plaintiffs' allegations.

15. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 15 of the Defendant/Counter-Plaintiffs' Counterclaim.

16. Plaintiff/Counter-Defendant denies the allegations, if any, contained in the Prayer for Relief in Defendant/Counter-Plaintiffs' Counterclaim.

**AFFIRMATIVE DEFENSES**

17. Plaintiff/Counter-Defendant pleads the prior breach of Defendant/Counter-Plaintiff.

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff/Counter-Defendant prays that Defendant/Counter-Plaintiff take nothing by its claims and for such other and further relief to which Plaintiff/Counter-Defendant may be entitled.

**Respectfully submitted,**

**ICENOGL & BOGGINS, P.L.L.C.  
6805 N. Capital of Texas Hwy., Ste. 220  
Austin, Texas 78731  
Telephone: (512) 342-9519  
Facsimile: (512) 342-9555  
Email: anthony@icenoglefirm.com**

By: /s/ Anthony Icenogle  
**Anthony Icenogle**  
**State Bar No. 10382948**

**ATTORNEYS FOR PLAINTIFF/COUNTER-  
DEFENDANT, SERVICE LLOYDS  
INSURANCE COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that, on this **6th** day of **June, 2019**, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District, including the following:

Martin S. Schexnayder  
Winget, Spadafora & Schwartzberg, LLP  
Two Riverway, Suite 725  
Houston, Texas 77056  
Schexnayder.M@wssllp.com

/s/ Anthony Icenogle  
**ANTHONY ICENOGLE**